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September 7, 1999

VIA HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

> Re: Implementation of the Local Competition Provisions
>   Of the Telecommunications Act of 1996 (UNE Remand)
>   CC Docket No. 96-98

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel"), by its undersigned counsel, hereby gives notice that on September 3, 1999, its representatives met with Commissioner Furchtgott-Roth and his legal advisor, Bill Bailey, to discuss the availability of unbundled network elements and of combinations of network elements. Representing CompTel were Russell Frisby, President of CompTel, and David Malfara, President of Z-Tel Network Services, Inc. and Chairman of CompTel's Technology Committee.

In the meeting, CompTel urged the Commission to continue to make UNE combinations available, and to ensure that combinations are available without any customer or use-base restrictions. CompTel described the types of services that new "applications providers" can develop using UNE-P which are not available using resale or other alternatives. CompTel also discussed the impact use-based restrictions in New York have upon the customer base a carrier can serve. The attached materials were distributed during the meeting.

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DC01/AUGUS/90954.1

        In accordance with Section 1.1206(b), an original and one copy of this notice is being provided.

                                        Sincerely,

                                        Steven A. Augustino

SAA:pab

Enclosures

cc: Hon. Harold Furchtgott-Roth
        Bill Bailey

Z-Tel Technologies, Inc. has invested more than $30MM in developing innovative services that blur the conventional dividing line between telecommunications services and enhanced services. At certain points within the same subscriber session, the very same Z-Tel service could easily be classified as either.

The value that Z-Tel brings to market is a unified presentation, of commodity services and enhanced applications, based upon the real-time requirements of the user rather than the status of that service's regulatory classification. In this way, the user receives an integrated service far superior and easier to use than that which exists in the conventional PSTN today. Z-Tel is a provider of, both, commodity and enhanced services since the user requires both to accomplish her goals of instant communication. Unbundled Local Switching is integral to Z-Tel's design architecture and the lack of it's availability as an Unbundled Network Element will severely impair the ability of Z-Tel to provide the services that it seeks to offer.

UNBUNDLED LOCAL SWITCHING

Unbundled local switching is required to allow new, more innovative competitors like Z-Tel, the opportunity to bring profoundly unique and superior communications capability to the business and residential market. Building a customized office dialing plan in each class 5 switch, Z-Tel can offer abbreviated dialing plans, dynamic virtual private networks and a more integrated calling and messaging experience for consumers with support for self-defined groups and communities. As a pre-requisite of Z-Tel's enhanced offering, Class 5 Line Class Code templates are built to identify groups and classes of subscribers, and are used together with customized routing software, and Z-Tel databases, in order to bring web-based supervisory control to call routing. These capabilities make possible such Z-Tel features as:

Web Dial (with Conferencing)
Click & Return Call (PSTN under Web control)
Messaging (Group and Individual)
Web Controlled Follow-Me Service
Dynamic Personal Directory Service (Synchronized with Palm Pilot or Outlook)
Dynamic Community Directory Service

Z-Tel's use of the features functions and capabilities of unbundled local switching will also soon include AIN switch triggers, which allow our proprietary software intelligence to further energize the local service of the subscriber. Local service is tightly integrated as only a component of a much more robust communications environment under supervisory control of Z-Tel's proprietary applications and databases. This gives the subscriber access, in real time, to our supervisory. For example, in addition to simple, basic message indicators such as stutter dial tone or distinctive ring, Z-Tel can announce the number of messages waiting, or the immediacy of an upcoming appointment prior to dial tone when the subscriber lifts the handset. The subscriber's own dynamic directory can be a button away using the appropriate AIN trigger component of local switching. After quickly gaining access to this directory, using SS7 signaling between our Z-Node and the local switching UNE, the subscriber can dial by name, by group or not dial at all using voice recognition to contact the called party.

Even our most basic services would not be possible in a resale model. With resale, a competitor is forced to offer a subset of the services the incumbent provides, instead of gaining access to the tools

(unbundled network elements) necessary to build its own, market differentiating services. There is no way to integrate additional intelligence into call processingFurther, in the case of local switching, an end user would have to pay local message unit charges to gain access to

why should a forward looking competitor such as Z-Tel be forced to invest in the archaic legacy systems of old (class 5 switching) before it is able to bring new, market differentiating services to consumers. The existing local network is clearly meant, by the authors of the Telecommunications Act, to serve as a launching platform for competition. Local switching is clearly the central element of the local network's monopoly advantage. Unbundled local switching is vital to counteract that advantage.

Z-Tel Technologies, Inc.

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First Report and Order

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Z-Tel Technologies, Inc.

Z-Tel integrates

•Real-time
communications

•Messaging

•Communities

Z-Tel uses advances in technology, regulatory reforms, and network architecture to deliver superior communication services for consumers and businesses.

•Technology and Software Development Company
•Network Company (CLEC and IXC)
•Application Hosting/Carrier
•Started January of 1998
•First 18 months dedicated to software and hardware development
•150 plus employees with over 80 in software development, advanced network planning, and technical operations

Today's Communications

Current communications services are fragmented among specialized providers with little or

Today's World

Fax   Local Service

E-mail   Long Distance
                          Service

Chat   Mobile Service

Instant Message   VoiceMail
          Paging
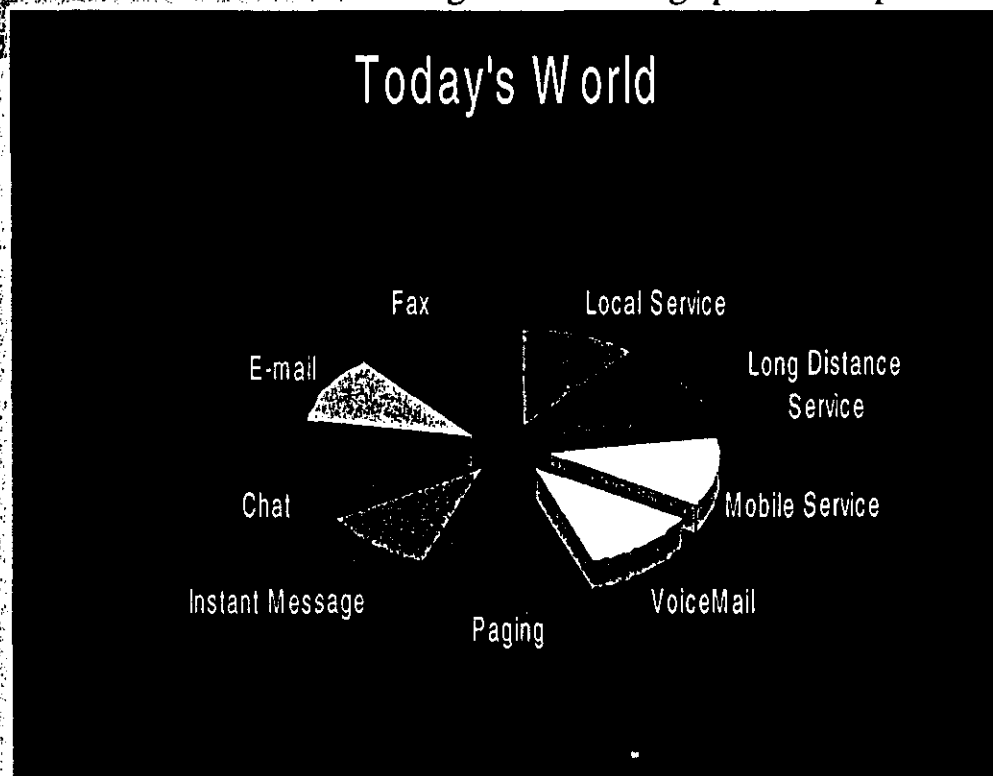
Z-Tel provides an integrated communications package...

Z-Line - The Killer App

Your Personal
Communications
Center allows you to:

•Find you at your office,
mobile phone or
anywhere in the world

•Send and receive voice
messages nationwide (at
no charge)

•Manage and control
your telecommunication
services on the web

•Listen to your voice
messages over the web

•Create personal
communities

Your Personal Communications Center (PCC) becomes the center for all of your communications needs.

The Killer Application for Communications
The Personal Communications Center

Fax   Local Service
E-mail   Long Distance
              Service
PCC
Chat   Mobile Service
Instant Message   VoiceMail
        Paging
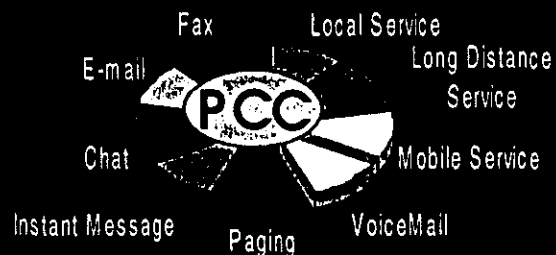
Z-Line does more, is easier to use and costs less.

Z-Line

Your Z-Line Personal Communications Center provides an integrated communications package.

You get a personal communications center on the web to manage messages, place calls, update directories, and change configurations for your phone service...

and you can use the service seamlessly from any phone or the web....

Home

▶ About Z-Tel

▶ Products

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Preferred
  Vendors

Sales Agents

Your Personal Communications Center

powered by
powered
Z-TEL

Calling

Call from the Web and replace long distance with a Z-Line.

Don't miss a message with Notify Me and Nationwide Voicemail.
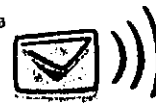
Messaging

Address Book

Keep your contacts on the Web and keep them synched with MS Outlook.

Communities

Contact everyone in your group with ease using Community Messaging.

Member Sign In

Member Name

Password

Sign In

Forgot Your
Password?

Visitors

Join Now!

Free Test Drive

Products & Services Powered by Z-Tel

Z-Line Home Edition - Your Complete Communications Solution
Local residential, long distance, internet, and a Z-Line! What could be better?

Z-line - Your Personal Communications Center
Call a local or 800 access number to reach your Z-Line anywhere, anytime.

Home · Assistance · Access Numbers · Join Now!

© 1999 Z-Tel Communications, Inc.

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powered
Z-TEL

Z-Line

Your Z-Line Personal Communications Center includes the following Messaging services:

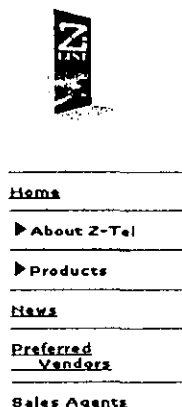**Voice Mail** - *a voice inbox for receiving and storing your messages*

Notify Me - *a notification service that alerts you via email or pager when you receive a voice mail message*

* Email - *sending and receiving email through the myzline.com interface*

* Fax - *sending and receiving fax mail through the myzline.com interface*

* Paging - *direct member paging*

* coming soon

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Your Personal Communications Center

Z-Line:	404-892-1414
Voice Mail:	ON	TURN OFF
Find Me:	ON	TURN OFF
Web Dial:	

HOME | LOG OUT

| Messaging | Calling | Address Book | Communities | Account | Assistance |

Voice Mail | Notify Me | Email | Fax | Paging

Messaging

Folders

INBOX (4)   SAVED (1)

INBOX Messages
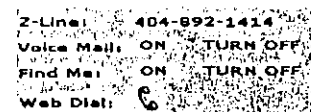
4 total messages, 0 new   Check for new messages

New	Select	Play	Call	From	Subject	Time (EST)
	□			123-456-7890	Voice Message	7/1/99 11:22 AM
	□			123-456-7890	Voice Message	7/1/99 11:22 AM
	□			123-456-7890	Voice Message	7/1/99 11:22 AM
	□			123-456-7090	Voice Message	7/1/99 11:22 AM

□ Click to select all messages

Move To: INBOX ▼   Delete

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Your Personal
Communications Center

Z-Line

Z-Line
Your Personal Communications Center

Z-Line: 342521
Voice Mail: ON   TURN OFF
Find Me: ON   TURN OFF
Web Dial:

HOME | LOG OUT

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▶ Sales Agents

My Z-Line

| Messaging | Calling | Address Book | Communities | Account | Assistance |

Web Dial | Find Me | Conference

Web Dial ⑦

I'm at this number: [▼] or [ ]

☐ Remember my current location

(Select a number where you can be reached. These numbers are from your "My Numbers" list. If the number you want is not in the list, enter it in the box below the list.)

I want to dial: [ ] Dial

(Enter the phone number you want to call, then click 'Dial' to place the call.)

Connect to Z-Line: [Z-Line Call Me]

(If you just want your Z-Line to call you, click here - a great way to check your voice mail.)

Hang Up Your Phone: [Hang Up]

(If you want to hang up your call, either click here or just hang up the receiver.)

Home · Log Out · Assistance · Access Numbers   [Return to Top]
Refer Others and Earn $5 Z-Line Credit
©1999 Z-Tel Communications All Rights Reserved - Member Agreement

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powered

Z-Line

Your Z-Line Personal Communications Center includes the following Calling services:

Find Me - *a call connection feature that allows you to link your Z-Line to your existing phone numbers*

Web Dial - *initiates calls from the web (over the PSTN - Public Switched Telephone Network)*

* Conference - *bridging multiple parties onto a single call*

* Call History - *inbound and outbound call listing*

* coming soon

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Your Personal
● Communications Center

Z-Line: 404-892-1414
Voice Mail: ON TURN OFF
Find Me: ON TURN OFF
Web Dial:

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Find Me | Web Dial | Conference | Call History

Calling

Find Me Numbers

When a caller wants to get in touch with you, your Z-Line will try to find you at up to three different phone numbers (home, work, cellular, pager, etc.). Enter your phone numbers in the order in which you want your Z-Line to call them.

1: [404-892-1111]   Pick from list: [- ▼]

2: [   ]   Pick from list: [- ▼]

3: [   ]   Pick from list: [- ▼]

⦿ Turn On Find Me   Edit my I'm @ list

○ Turn Off Find Me

⦿ Allow callers to find me on a long distance call (billed to me)

○ Do Not allow callers to find me on a long distance call

[Save]   [Reset]

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Your Personal
Communications Center

Z-Line

Your Z-Line Personal
Communications Center
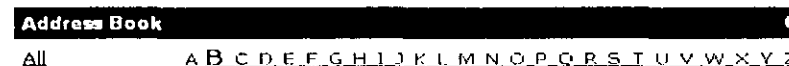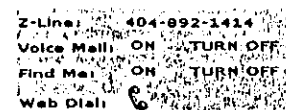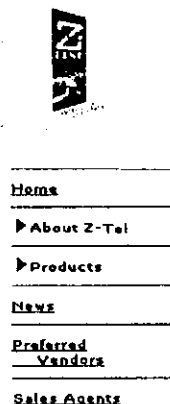includes the following
Address Book services:

Contacts - *maintains your
personal address book for
adding, editing and deleting
contacts*

Lists - *allows you to organize
your contacts into messaging
distribution lists*

Synchronize - *imports contacts
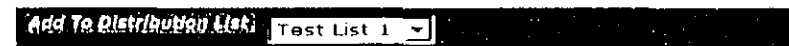from other applications (Outlook,
etc.)*

General Directory - *searches for
other Z-Line members*

Refer Others - *email engine for
generating referral messages to
build your community*

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Your Personal
Communications Center

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Voice Mail: ON   TURN OFF
Find Me: ON   TURN OFF
Web Dial:

HOME | LOG OUT

| Messaging | Calling | Address Book | Communities | Account | Assistance |

Contacts | Lists | Synchronize | General Directory | Refer Others

Address Book

Address Book		?
All	A B C D E F G H I J K L M N O P Q R S T U V W X Y Z	

Addresses	?

You can add contacts by clicking on the "Add Contacts" button, or
import contacts from the General Directory.

Select	Speed Key	Name	Preferred Phone	Call	E-mail
☐		Checkcust Buchheit	404-892-1111	☎	
☐		James Buchheit	404-892-1111	☎	t1@email.com
☐		Don Butts	404-812-6637	☎	dbutts@s1.com
☐		Click to select all contacts			

Add Contacts   Delete Contacts

Add To Distribution List:	Test List 1 ▼

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Z-Line

Your Z-Line Personal
Communications Center
includes the following
Communities services:

My Communities - *create and
build your own communities*

Directory - *searches for other Z-
Line communities*

General Directory - *searches for
other Z-Line members*

Administrate - *interface for
maintaining communities*

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Z-Line: 404-892-1414
Voice Mail: ON TURN OFF
Find Me: ON TURN OFF
Web Dial:

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| Messaging | Calling | Address Book | Communities | Account | Assistance |

My Communities | Directory | General Directory | Administrate
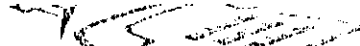
Communities

My Communities			❓

Select	Name	Members	Speed Key
☐	Batch load From cmty	1	1122
	Batch Load From Cmty		
☐	Community Test One	1	09
☐	Curts test community	3	45
	Test batch load members		
☐	Click to select all Communities		

Add Community: Edit Communities Delete Community

Home - Join Now!
Explore - Assistance - Access Numbers - Address Book
Calling - Coming Attractions - Communities - Messaging - Phone
About Z-Tel - Z-Tel - Z-Tel From Home - Security Policy
Tech Info - Preferred Vendors - Press Releases - Sales Agents

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Z-Line

Your Personal Communications Center

Your Z-Line Personal Communications Center includes the following Account services:

My ID - *maintenance of security identification*

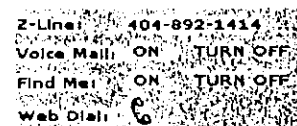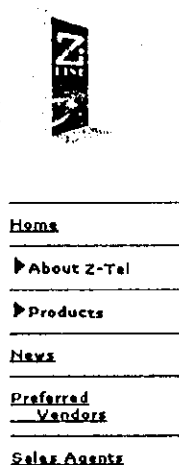**I'm @** - *ten most frequent numbers for calling and configuration*

Fast Access - *caller ID technology to authenticate telephone access*

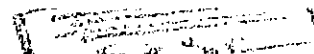**Profile** - *maintains address and billing information*

Statements - *on-line summary and detailed statement information*

* Current Month - *near real-time call detail*

* coming soon

Your Personal Communications Center

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Z-Line   404-892-1414
Voice Mail   ON   TURN OFF
Find Me!   ON   TURN OFF
Web Dial!

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My ID | I'm @ | Fast Access | Profile | Statements | Current Month

Account

Select your Telephone PIN

Required information is indicated by an *.

PIN: |****| * |****| *   (Re-type)

Select a WEB Member Name and Password

Member Name: |ccccc| *

Password: |******| * |******| * (Re-type)

[Save]   [Reset]

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Refer Others and Earn $5 Z-Line Credit.   ©1999 Z-Tel Communications All Rights Reserved
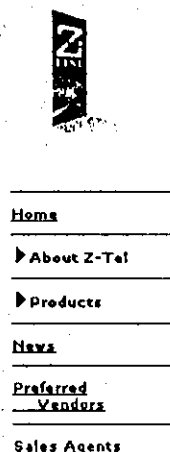
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Z-Line

Your Z-Line Personal
Communications Center
includes the following
Assistance services:

User Guide - *help and
instructions for using your Z-Line*

Contact Us - *email and Live
Chat with a customer care
associate*

Access Numbers - *listing of
local and toll free Z-Line access
numbers*

**Your Personal
Communications Center**

Z-Line   404-892-1414
Voice Mail.   ON   TURN OFF
Find Me   ON   TURN OFF
Web Dial.

HOME | LOG OUT

| Messaging | Calling | Address Book | Communities | Account | Assistance |

User Guide | Contact Us | Access Numbers

Assistance

Contact Us

The Z-Tel Team is committed to deliver the access, service and tools
tailored to you to get the most out of the Internet and to improve the
way you communicate with others. We will continue to challenge
ourselves to refine our services that will continually satisfy our
customers. In order for us to speed up this process, we want your
feedback. If you have any comments or suggestions, please feel free to
contact us through o-mail, Customer Service, or through LivePerson,
which permits real-time chat.

Call Us

Call our Contact Center at
1-800-511-4572

Live

Need help?
CLICK AND
CHAT!
Live Customer Service

Email

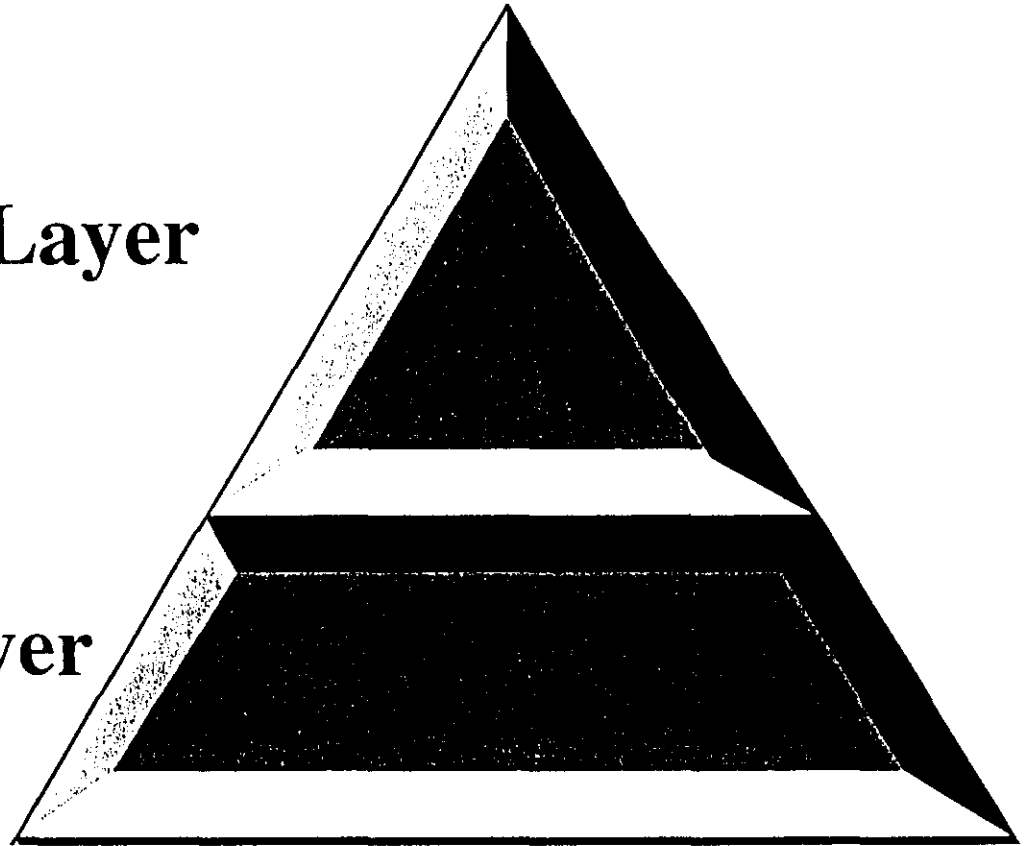Send us an email at info@z-tel.com

Click Here to fill out an email form.

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Basic Exchange Network

Application Layer

Network Layer
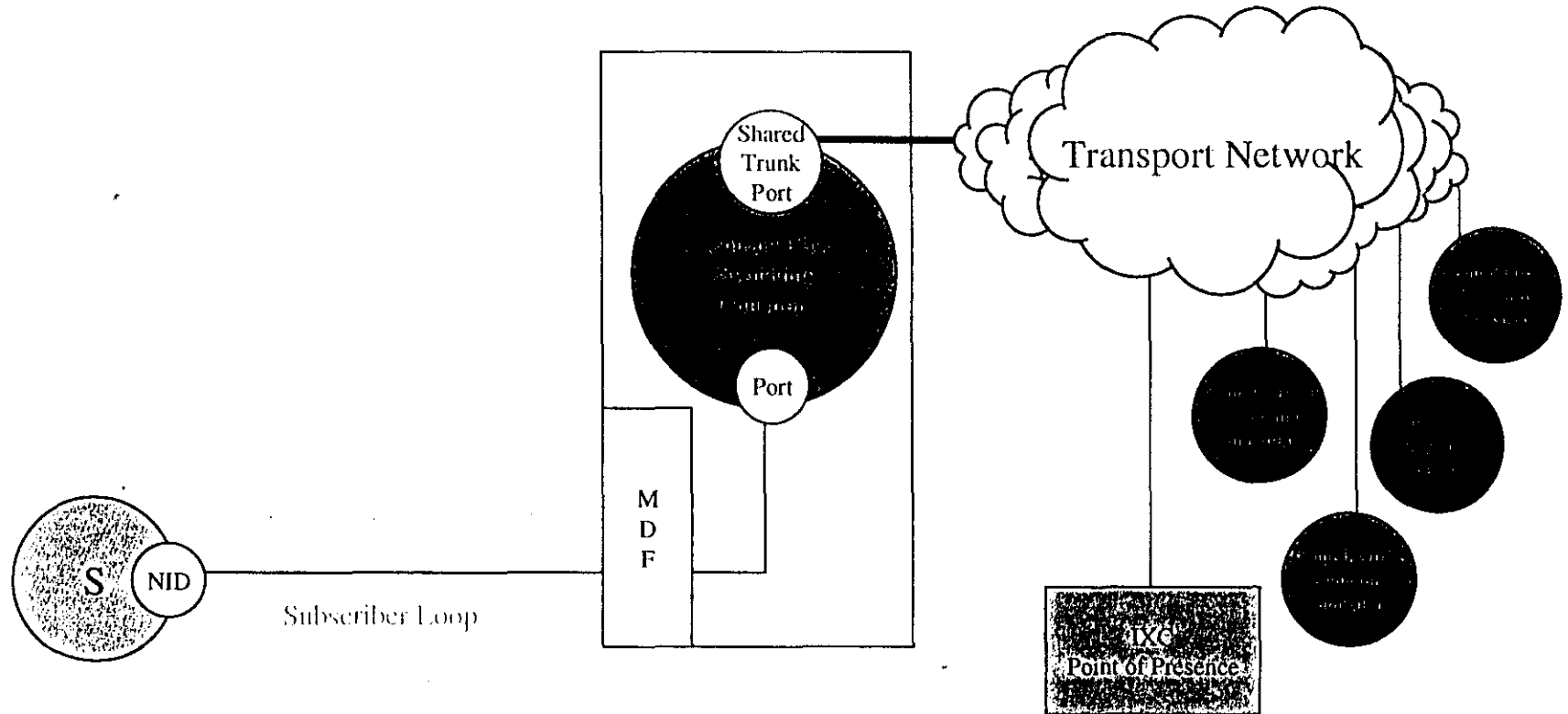
Network Layer

Shared
Trunk
Port

Transport Network

Port

M
D
F

S NID

Subscriber Loop

IXC
Point of Presence

powered by
powered

Z-Tel Application Layer

UNE
Platform

Shared
Trunk
Port

Port

ILEC
Transport Network

Z-Tel
New York POP

M
D
F

S NID

Subscriber Loop

Dial 9 for Personal Communications Center

CISCO
AS5800

Z-Node

Entrance Facility

The
Internet

Z-Tel
Network

Z-Tel Tampa POP

powered by
powered
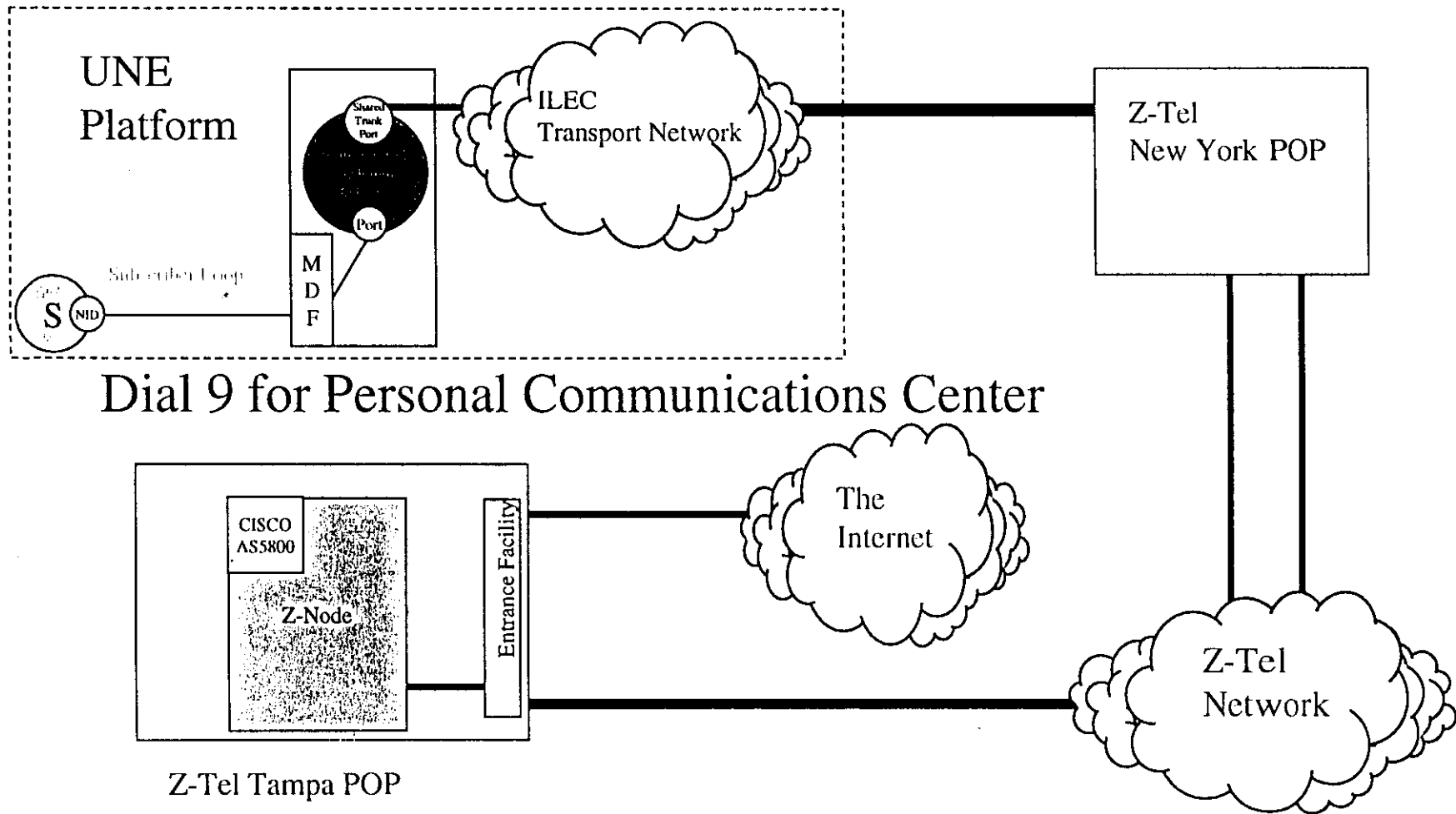
Z-Tel Technologies, Inc.

A Product of the First Report and Order

- Full List Of UNEs

- Access To UNE Combinations For Basic Network Function

- UNEs As Generic Functions

- No Use/User Restrictions*

- *Freedom To Innovate*

New York Experience

Markets Open

- Residential

*Markets Foreclosed

- Business
- SOHO
- Academic Institutions
- Other Institutions
- *Telecommuter*

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